

**THE JOSEPH GROUP
MANAGEMENT CONSULTANTS, LTD.**

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December 1, 1994

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The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: PR Docket No. 92-235

DOCKET FILE COPY ORIGINAL

Dear Chairman Hundt.

I am writing this letter to stress that as the Commission proceeds to complete "refarming" of private mobile radio frequencies, it should avoid any consolidation of the existing Radio Services.

Re-farming will be a complex undertaking involving migration of millions of users from one channel plan to another. The last thing the Commission should do at this point is merge Radio Services and users who would be expected to pay for, and benefit from, the additional spectrum to be created. Instead the Commission should capitalize on the experience and strengths of the various user groups. For example, the agency should utilize the existing Radio Service groups to tailor their own transition and channel plans within broad guidelines established by the Commission. In so doing the agency would minimize disruption to the user community and facilitate a smoother transition to narrower bandwidths.

Moreover, preservation of the existing Radio Services would not only maintain the representative nature of those Services, but also compatibility between and among the users who share channels. The end result is a shared channel environment that minimizes interference between and among disparate groups of users.

Accordingly, our company endorses the concept of a gradual move to narrower channels as long as such result does not also entail consolidation of the Taxicab Radio Service.

Copies of this letter are being issued to the Commissioners, Ralph Haller, Kathryn Hosford, and the docket file.

Sincerely,

[Signature] Michael J. ...
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